

From: [BAYUK Dana](#)
To: [Kristine Koch/R10/USEPA/US@EPA](#); [Sean Sheldrake/R10/USEPA/US@EPA](#)
Cc: [Eric Blischke/R10/USEPA/US@EPA](#); [Rene Fuentes/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [ANDERSON Jim M](#); [GAINER Tom](#); [HAFLEY Dan](#); [LARSEN Henning](#); [MCCLINCY Matt](#)
Subject: FW: Siltronic & DEQ meeting
Date: 03/26/2008 01:13 PM
Importance: High

Hello there.

I'm forwarding an e-mail received from Siltronic this morning regarding the meeting held last week with EPA and NW Natural. I understand the meeting focused on the direction and timing of in-water work off the NW Natural and Siltronic properties. Siltronic also indicates the topic of using enhanced in-situ bioremediation (EIB) along/near the riverbank was discussed.

Given my conversation with Sean this morning, I thought you'd be interested in Siltronic's perceptions of the EIB meeting discussions.

DEQ acknowledges that Siltronic invested quite a bit of time, money, and effort researching EIB and assessing its use at the site. They are understandably very interested in making full use of these efforts. As I'm sure you know, DEQ approved use of EIB in the upland portion of the site where the VOC releases occurred (former solvent UST system).

However, DEQ did not approve EIB use along/near the shoreline for many reasons, among them: 1) the need to postpone (for an undetermined amount of time) NW Natural's source control measures (SCMs); 2) EIB is designed for VOCs only; 3) the potential for EIB to interfere with future performance and operation of NW Natural's SCMs; and 3) the potential for EIB to impact groundwater and the river. Given EIB only effects VOCs, it was also unclear that the environmental benefit justifies the risk of implementation.

After talking with Sean, I would add to the list that in-water actions being discussed by EPA and NW Natural would address VOCs (and MGP) in the TZW through removal.

Hope everyone's day is going well and let me know if you have questions regarding anything that came up during the meeting last week.

Dana

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-----Original Message-----

From: James Peale [mailto:jpeale@mfainc.org]
Sent: Wednesday, March 26, 2008 9:01 AM
To: BAYUK Dana; MCCLINCY Matt; ANDERSON Jim M
Cc: McCue, Tom; Gladstone, Alan; Chris Reive
Subject: RE: Siltronic & DEQ meeting

Dana - thanks for letting us know about Tom, Henning and Dan's availability. I think that there are some less technical issues that need discussion, and warrant a meeting fairly soon.

First, with respect to the source area implementation, we think that we can reach consensus fairly quickly on a general approach, which will facilitate development of the Workplan.

Secondly, we met with NWN and EPA last week regarding the scope and schedule of in-river action. NWN presented a scope of work that will likely address Area 2 TCE-related impacts and larger MGP-related impacts. There was consensus between EPA and NWN that implementation of an in-river action was at least two years away.

We summarized our recommended approach for Area 1 and DEQ's comments on the FFS, noting that we understand DEQ's objective to meet the EPA schedule for the Portland Harbor ROD. We also identified DEQ's concerns with implementation risks related to iron, and summarized the recent data provided to DEQ in our March 6, 2008 response to comments.

There was consensus between NWN, Siltronic and EPA that (a) with respect to the schedule for in-river work, there is ample time for the sequenced approach as recommended by Siltronic and (b) integrating an EIB PRB with the NWN upland SCMs is practicable and makes sense. Further, EPA agreed that implementation of an EIB PRB at the riverbank was likely the only practicable approach for TZW in Area 1, which we noted DEQ had identified as subject to EPA's oversight.

We understand that this recent feedback represents a change in the assumptions under which the Siltronic FFS report was prepared and reviewed, such that DEQ's decision regarding an EIB PRB at the riverbank requires reconsideration. This is the second, broader topic that we would like to discuss with DEQ fairly soon, since there are potentially significant scheduling and coordinating implications.

As such, we would like to meet with you and other DEQ Portland Harbor Section staff (including Jim and Matt) to discuss this. We are available this Thursday from mid-day until about 4:30, and next Thursday as well.

Please call or email if you have any questions.

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From: BAYUK Dana [mailto:BAYUK.Dana@deq.state.or.us]
Sent: Monday, March 24, 2008 6:34 PM
To: James Peale
Subject: Siltronic & DEQ meeting

Hello James.

I have not heard back from Tom, Dan, or Henning on whether they are available to meet sometime this Thursday (3/27) or next Thursday afternoon (4/3).

I'll let you know as soon as I hear.

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